

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,	§	
Plaintiffs,	§	CIVIL ACTION NO.
	§	
v.	§	5:21-CV-0844-XR
	§	
STATE OF TEXAS, et al.,	§	[Consolidated Action: Lead Case]
Defendants.	§	

**DEFENDANT HILDA A. SALINAS'S
RULE 26(a)(3) PRETRIAL DISCLOSURES**

TO THE HONORABLE COURT:

Defendant Hilda A. Salinas, in her official capacity as Hidalgo County Elections Administrator (“Defendant Salinas”), pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, makes her pretrial disclosures. Defendant reserves the right to amend her disclosures to include witnesses or exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties’ disclosures made under Rules 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses Defendant Salinas expects to present:

None

Witnesses Defendant Salinas will call if the need arises:

None.

The following witnesses will testify, if necessary, regarding attorneys’ fees and costs:

Josephine Ramirez-Solis, Attorney Fees Expert
Victor M. Garza, Attorney Fees Expert
c/o Hidalgo County Criminal District Attorney’s Office
Civil Litigation Division
100 E. Cano
Edinburg, TX 78539

B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, the Defendant Salinas reserves the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii).
See Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits Defendant Salinas expects to offer:

None.

Documents and other exhibits Defendant Salinas will offer if the need arises:

None.

Respectfully submitted,

TORIBIO “TERRY” PALACIOS
CRIMINAL DISTRICT ATTORNEY
HIDALGO COUNTY, TEXAS

/s/ Josephine Ramirez-Solis

Josephine Ramirez-Solis
Assistant District Attorney
Texas Bar No. 24007894
josephine.ramirez@da.co.hidalgo.tx.us
Leigh Ann Tognetti
Assistant District Attorney
Texas Bar No. 24083975
leigh.tognetti@da.co.hidalgo.tx.us
100 E. Cano, First Floor
Hidalgo County Courthouse Annex III
Edinburg, Texas 78539
Tel: (956) 292-7609
Fax: (956) 318-2301
ATTORNEY FOR DEFENDANT
HILDA A. SALINAS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on July 28, 2023, with the clerk of court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Josephine Ramirez-Solis
Assistant District Attorney